BLODGETT BAYLOSIS ASSOCIATES
Planning ● Environmental ● Economics ● Mapping

September 23, 2013

Mr. Alex Hamilton, Assistant Community Development Director
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2535 Commerce Way
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Subject: Response to SCAQMD's Letter Concerning the Washington Boulevard (Transportation Projects) Air Quality Conformity.

Mr. Hamilton:

The purpose of this memorandum is to briefly outline our responses to the letter submitted by the South Coast Air Quality Management District (SCAQMD) related to the Air Quality Conformity Analysis recently prepared for the Washington Boulevard Improvement Project. Before addressing the specific comments raised by Mr. Dan Garcia at the SCAQMD, it appears that Mr. Garcia's review is based on an earlier worksheet that was revised based on input from Mr. Andrew Yoon at Caltrans. Nevertheless, we have prepared the following responses to each of the comments raised in the SCAQMD letter, dated September 18, 2013.

Comment 1.

Criteria for PM2.5 and PM 10 Hot Spot Analysis (Background). Based on a review of the PM Hotspot Interagency Review form the proposed project appears to meet the requirements for a PM2.5 and PM10 Hot Spot Analysis pursuant to Section 40 CFR 93.123(b)(1)(ii) of the federal conformity rule. Specifically, Section 40 CFR 93.123(b)(1)(ii) states that a quantitative $PM_{2.5}$ and PM_{10} spot analysis is required for "projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project." As a result, the information provided in the PM Hotspot Interagency Review Form demonstrates that the project the criteria in this section of the federal conformity rule including the based on the following (subsequent comments).

Response 1.

We will address the specific concerns in the responses that follow. However, our preliminary review concluded that the Washington Boulevard Improvement Project was not considered a project of air quality concern (POAQC) for PM_{10} and/or $PM_{2.5}$ because it did not meet the definition of a POAQC as defined in EPA's Transportation Conformity Guidance.

According to the EPA Transportation Conformity Guidance, the following types of projects are considered POAQC:

1) *New or expanded highway projects that have a significant number of or significant increase in diesel vehicles (a significant number is defined as greater than 125,000 Annual Average Daily Traffic [AADT] and 8% or more of such AADT is diesel truck traffic, or in practice 10,000 truck AADT or more regardless of total AADT; significant increase is defined in practice as a 10% increase in heavy duty truck traffic).* The proposed project does not meet these criteria. The proposed project will not result in any increased traffic generation associated with a redistribution of area traffic or any growth-inducement impacts. The proposed project will provide congestion relief and improved safety through the roadway and intersection improvements.

2) *Projects affecting intersections that are at a Level of Service D, E, F, with a significant number of diesel vehicles, or that will change to Level of Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.* The proposed project does not meet this criterion. The proposed project will not result in any cumulative increased traffic that would degrade the level of service at any study area intersections. The traffic study prepared for the proposed project indicated that the level of service would improve at all of the study area intersections due to the intersection and signalization improvements.

3) *New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location.* The proposed project does not meet this criterion. The project does not involve any new bus and rail terminals or transfer points.

4) *Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location.* The proposed project does not meet this criterion.

5) *Projects in or affecting locations, areas, or categories of sites which are identified in the $PM_{2.5}$ or PM_{10} implementation plan or implementation plan submission, as appropriate, as sites of possible violation.* The proposed project does not meet this criterion.

The proposed Washington Boulevard Improvement Project will be expected to reduce air emissions due to the improved traffic flow that will be realized as part of the proposed project's implementation. Furthermore, the removal of the existing deteriorating pavement surfaces with a new concrete roadway surface will be beneficial in that particulates from the existing damaged roadway surfaces will be eliminated.

Comment 2

Intersection Level of Service. In the project description the lead agency states that the traffic analysis for the proposed project demonstrated substantial improvement in the roadways operating level of service would result from implementation of the project. However, Table 1 (Existing and Future Year (2035) Level of Service) in the PM Hotspot Interagency Review Form does not support this statement. For example, Table 1 indicates that at the intersection of Washington Boulevard and Atlantic Avenue the future level of service (LOS) is E that is worse than the existing LOS at this intersection of D. Therefore, SCAQMD staff recommends that the lead agency provide additional information to substantiate the determination discussed above or prepare a quantitative PM Hotspot analysis consistent with federal guidelines.

Response 2.

The information referenced in the Table indicated that the LOS for the intersections will be improved with the project compared to the LOS of the same intersections without the project. Any decrease in the LOS between the existing and future year is related to ambient traffic growth, not the result of the Washington Boulevard Improvement Project. The City has emphasized that the project's implementation *will not* result in any increase in traffic or an attendant impact on intersection LOS. This determination is based on the following:

1. The proposed project will involve intersection improvements and roadway restriping that will facilitate the addition of a third travel lane in each direction during the peak hour traffic periods. The improvements will be confined to the existing roadway right-of-way. The project is designed to relieve congestion along this roadway segment.

2. The traffic analysis prepared for the proposed project demonstrated that a substantial improvement in the roadway's operating level of service would result from the proposed project's implementation. The roadway improvements will not result in any additional traffic generation. Any increased traffic is related to regional ambient traffic growth and other "goods movement" projects in the region. The Washington Boulevard Improvement Project will not result in any additional traffic generation beyond the baseline levels. The traffic levels for the year 2015 and the 2035 build-out years for both *without* and *with* the project will be the same.

3. While the proposed project is expected to improve operations and travel flow along the improved roadway segment, the travel time savings would not be expected to induce significant changes in travel behavior. There are a limited number of major roadways in Commerce (Whittier Boulevard, Bandini Boulevard, and Slauson Avenue) that parallel Washington Boulevard and none of these roadways serve the same geographic area that is served by Washington Boulevard.

4. The Washington Boulevard roadway segment in Commerce (west of the I-5 Freeway) represents the major remaining link of the roadway that still contains two travel lanes in each direction. The Washington Boulevard segment in Pico Rivera and Montebello (to the east of Commerce) and in Vernon (west of Commerce) consist of three travel lanes. The Washington Boulevard Improvement Project will eliminate an existing "bottleneck" resulting from the different roadway configuration.

Comment 3

Significant Diesel Truck Traffic. In Table 2 (Baseline Year, Opening Year and Future Year Traffic Volumes) of the PM Hotspot Interagency Review Form the lead agency indicates that the proposed project will result in less than a 1% increase of heavy duty truck traffic along Washington Boulevard. However, based on the recent Environmental Impact Report Certified by the City of Los Angeles for the Southern California Intermodal Gateway (SCIG) project the Hobart, Commerce and East L.A. Rail Yards are expected to facilitate an increase of approximately six (6) million twenty-foot equivalent units (TEUs) by 2035. This increase represents a 200% increase of TEUs from the baseline activity at the rail yards directly adjacent to the project site. Consequently, it is reasonable to assume that the proposed project will facilitate this significant increase in diesel truck activity as Washington Boulevard is a major access route for these rail yards. As a result, the traffic analysis appears to substantially underestimate future diesel truck activity (volume) along the project site. Therefore, SCAQMD staff recommends the lead agency revise the traffic analysis to account for the cumulative effect from the significant increase in truck activity (volume) at facilities surrounding the project site. In the event that the lead agency determines that this increased activity will result in local air quality concerns the lead agency should prepare a quantitative PM Hotspot analysis consistent with federal guidelines.

Response 3.

The City of Commerce, as part of its review of the aforementioned EIR, went on record as to the City's concerns regarding truck traffic impacting local streets. The Lead Agency failed to analyze the impact on the City of Commerce nor did the EIR provide for any mitigation. The mitigation of Port traffic related to the SCIG project is the responsibility of the Lead Agency for that project and is beyond the ability of the City of Commerce to implement. The aforementioned truck traffic impacts are directly related to the operation of the BNSF rail yard. The BNSF rail yard is located along the westernmost portion of the corridor (west of the I-710 Freeway). The majority of the diesel trucks use that Washington Boulevard travel on that segment located to the west of the I-710 Freeway that provides access to the BNSF rail yard.

The proposed Washington Boulevard Roadway Improvement Project *will not add* to the existing number if truck trips using this roadway. The Washington Boulevard improvement project will improve the existing level of service with the reconfiguration of the travel lanes (restriping, redesign of medians, etc.) that would facilitate the addition of a third travel lane

during the peak hour traffic periods. The proposed project will improve the *flow* of traffic along the corridor and at the intersections. A recent traffic study prepared for the project design indicated that delay times at the intersections will be shortened compared to the existing and no project condition. The trucks traveling on the improved roadway will experience less acceleration and braking in the mid-block segments and experience less idling times at the intersections due to the improved traffic flow. The reduction in braking and acceleration associated with the existing congestion will result in a reduction in diesel emissions, including particulate emissions. Finally, the roadway surface is deteriorating and the roadway improvement will eliminate the particulates related to the on-going deterioration of roadway surfaces.

The worksheet was revised to include more recent traffic LOS date collected where the HCM metric was used to calculate LOS at the study intersections. The more recent study indicated the baseline year (2012) LOS for the Washington Atlantic would improve from a LOS E to a LOS D if the improvements were implemented during the 2012 baseline year.

Comment 4

Traffic Analysis. On page 5 of the PM Hotspot Interagency Review Form the lead agency summarizes the traffic analysis for the proposed project. In this summary the lead agency stated that traffic volumes for the proposed project for opening year (2015) and build-out year (2035) were derived by adding an annual traffic volume growth factor of 1% per year, however, the annual average daily traffic volumes reported in Table 2 of the PM Hotspot Interagency Review Form do not reflect this growth assumption (i.e., growth factor of 1%). Based on Table 2 it appears that the reported traffic volumes represent a 0.1% annual growth rate and an overall 2.7% increase in volume between opening year (2015) and build-out year (2035). Therefore, SCAQMD staff recommends that the lead agency revise the traffic analysis to reflect the growth assumptions discussed on page 5 of the PM Hotspot Interagency Review Form or provide additional information to substantiate the traffic conclusions reported in Table 2 of the PM Hotspot Interagency Review Form.

Response 4

A truck count study for Washington Boulevard was completed this past year by Linscott, Law, and Greenspan. The more recent truck counts, included in Table 1 provided on the following page, indicates the percentages of truck traffic are substantially lower that the figures originally shown. The majority of the trucks using Washington Boulevard use that segment of Washington Boulevard located to the west of the I-710 to access the BNSF rail yard. Intersection peak hour truck volumes along this segment accounts for 27% to 30% of the total traffic on Washington Boulevard. The percentage of peak hour truck traffic at those intersections located on Washington Boulevard east of the I-710 is much lower, accounting for between 8% and 16% of the total traffic. The truck count data is summarized in the Table provided on the following page. Intersections #1 and #2 are located to the west of the I-710 Freeway while intersections #3 through #5 are located to the east of the I-710 Freeway.

Table 1
EXISTING TRAFFIC VOLUMES

NO.	INTERSECTION	TIME PERIOD	TOTAL VOLUME[4]	TOTAL TRUCKS [5]	PERCENT TRUCK TRAFFIC
1	Indiana Street & Washington Boulevard [1]	AM Peak Hour PM Peak Hour	1,255 1,667	374 457	30% 27%
2	Arrowmill Avenue & Washington Boulevard [1]	AM Peak Hour PM Peak Hour	1,360 1,765	378 511	28% 29%
3	Atlantic Boulevard & Washington Boulevard [1]	AM Peak Hour PM Peak Hour	3,086 4,042	480 643	16% 16%
4	Eastern Avenue & Washington Boulevard [1]	AM Peak Hour PM Peak Hour	2,518 3,092	276 236	11% 8%
5	Garfield Avenue & Washington Boulevard [1]	AM Peak Hour PM Peak Hour	3,927 4,217	410 380	10% 9%

The revised table that was included in the original worksheet is provided on the page that follows.

(Revised) Table 2

Baseline Year 2008), Opening Year (2015), and Future Year (2035) Traffic Volumes

Washington Blvd. Segment	Total AADT	Total Heavy Duty Trucks (No.)	Total Heavy Duty Trucks (%)
Baseline Year (2008)			
West of Ash St.	26,145	7,844	30%
West of Couts Ave.	34,007	8,502	25%
West of Strong Ave.	29,305	4,396	15%
West of Senta Ave.	27,311	4,097	15%
East of Saybrook Ave.	33,928	5,089	15%
East of Yates Ave.	32,948	4,942	15%
Opening Year (2015)			
West of Ash St.	28,311	8,493	30%
West of Couts Ave.	36,825	9,206	25%
West of Strong Ave.	31,733	4,760	15%
West of Senta Ave.	29,574	4,436	15%
East of Saybrook Ave.	36,739	5,511	15%
East of Yates Ave.	35,678	5,352	15%
Build-out Year (2035)			
West of Ash St.	34,203	10,261	30%
West of Couts Ave.	44,488	11,122	25%
West of Strong Ave.	38,337	5,751	15%
West of Senta Ave.	35,728	5,359	15%
East of Saybrook Ave.	44,385	6,658	15%
East of Yates Ave.	43,103	6,465	15%

Source: City of Commerce

I hope this summary has been helpful. If you have any questions, please do not hesitate to contact me at (626) 336-0033.

BLODGETT/BAYLOSIS ASSOCIATES, INC.

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